

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**RECOVERY LIMITED PARTNERSHIP,
Plaintiff,**

v.

Civil Action No.: 2:87-cv-00363

**UNIDENTIFIED, WRECKED AND ABANDONED
SAILING VESSEL, etc.,
Defendant.**

NOTICE OF MOTION TO SEAL

TAKE NOTICE THAT Recovery Limited Partnership (the “Plaintiff” or “RLP”), by counsel, pursuant to the Order of this Court dated May 15, 2023 (*See* Order, D.E. 296), moves this Court for leave to file under seal Exhibits 1 and 2 to the memorandum in support of RLP’s motion to seal. Exhibit 1 is the Declaration of Craig T. Mullen. Exhibit 2 is the Declaration of John B. Pidcock.

This serves as public notice that RLP is moving to file the above documents under seal. RLP’s grounds for seeking leave to file the above documents under seal are set forth in its Motion to Seal and Memorandum in Support. Any party or non-party who opposes or objects to the sealing of these documents must file its objection with the Clerk of Court within seven (7) days after the filing of this motion to seal. If no objection is filed in a timely manner, the Court may treat the motion to seal as uncontested.

This 14th day of June, 2023.

/s/ James L. Chapman, IV
James L. Chapman, IV, Esquire (VS. No. 21983)
CRENSHAW, WARE & MARTIN, PLC.
150 West Main Street, Suite 1923
Norfolk, Virginia 23510
Telephone: (757) 623-3000
Facsimile: (757) 623-5735
jchapman@cwm-law.com

Conrad M. Shumadine (VS. No. 4325)
Brett A. Spain (VS. No. 44567)
WILLCOX & SAVAGE, P.C.
440 Monticello Avenue, Suite 2200
Norfolk, Virginia 23510
Telephone: (757) 628-5500
Facsimile: (757) 628-5569
cshumadine@wilsav.com
bspain@wilsav.com
Counsel for Recovery Limited Partnership

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of June, 2023, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV
James L. Chapman, IV, Esquire (VS. No. 21983)
Counsel for Recovery Limited Partnership
CRENSHAW, WARE & MARTIN, PLC.
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Norfolk, Virginia 23510
Telephone: (757) 623-3000
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